

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**CASE NO.: \*\*\*\***

AFFORDABLE AERIAL PHOTOGRAPHY,  
INC.,

Plaintiff,

v.

FRONT OFFICE SPORTS, LLC,

Defendant.

**COMPLAINT FOR COPYRIGHT INFRINGEMENT**

**(INJUNCTIVE RELIEF DEMANDED)**

Plaintiff AFFORDABLE AERIAL PHOTOGRAPHY, INC. by and through its undersigned counsel, brings this Complaint against Defendant FRONT OFFICE SPORTS, LLC, for damages and injunctive relief, and in support thereof states as follows:

**SUMMARY OF THE ACTION**

1. Plaintiff AFFORDABLE AERIAL PHOTOGRAPHY, INC. (“AAP”) brings this action for violations of exclusive rights under the Copyright Act, 17 U.S.C. § 106, to copy and distribute AAP's original copyrighted Works of authorship.

2. Robert Stevens, owner of Affordable Aerial Photography, Inc., is a high-end real estate photographer who makes his living photographing million dollar homes for real estate agents. Stevens is an employee of his company, AAP, which provides photo shoots to a client’s specifications. Stevens is self-taught, but his photographs rival those taken by photographers who charge thousands more. AAP licenses its photos to agents pursuant to a written license. The license is granted only to the agent for whom the photos were taken.

3. Defendant FRONT OFFICE SPORTS, LLC (“FOS”) is a prime various-platform media and news group covering the intersection of sports, business, and culture. At all times relevant herein, FOS owned and operated the website located at the internet URL [www.frontofficesports.com](http://www.frontofficesports.com) (the “Website”).

4. Additionally, FOS owned and operated social media pages, one on X fka Twitter, located at the internet URL [www.x.com/FOS](http://www.x.com/FOS) (the “FOS X Page”) and one on Instagram, located at the internet URL [www.instagram.com/frontofficesports](http://www.instagram.com/frontofficesports) (the “FOS Instagram Page”). The FOS X Page and the FOS Instagram Page are collectively referred to herein as the “FOS Social Media Pages.”

5. AAP alleges that Defendant copied AAP’s copyrighted Works from the internet in order to advertise, market and promote its business activities. FOS committed the violations alleged in connection with Defendant's business for purposes of advertising and promoting sales to the public in the course and scope of the FOS' business.

### **JURISDICTION AND VENUE**

6. This is an action arising under the Copyright Act, 17 U.S.C. § 501.

7. This Court has subject matter jurisdiction over these claims pursuant to 28 U.S.C. §§ 1331, 1338(a).

8. Defendant is subject to personal jurisdiction in New York.

9. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) and 1400(a) because the events giving rise to the claims occurred in this district, FOS engaged in infringement in this district, FOS resides in this district, and FOS is subject to personal jurisdiction in this district.

**DEFENDANT**

10. Front Office Sports, LLC is a New York Limited Liability Company, with its principal place of business at 80 Pine Street, Suite 3202, New York, New York, 10005, and can be served by serving its Registered Agent, Adam White, 21 W 46th Street, Suite #1410, New York, NY, 10036.

**THE COPYRIGHTED WORKS AT ISSUE**

11. The below table details the Copyright Titles, Registration Numbers and Registration Issue Dates of the works of intellectual property at issue in this case, one of which is shown below, and which are referred to herein as the “Works.” Copies of the Works are attached hereto as **Exhibit 1**. Copies of the Registration Certificates are attached hereto as **Exhibit 2**.

<b><u>Title</u></b>	<b><u>Registration Date</u></b>	<b><u>Registration Number</u></b>
619 South Beach Rd_005	March 29, 2022	VA 2-297-479
619 South Beach Rd_012	March 29, 2022	VA 2-297-479
619 South Beach Rd_015	March 29, 2022	VA 2-297-479
619 South Beach Rd_020	March 29, 2022	VA 2-297-479
619 South Beach Rd_065	March 29, 2022	VA 2-297-479
619 South Beach Rd_078	March 29, 2022	VA 2-297-479
619 South Beach Rd_044	March 29, 2022	VA 2-297-479



619 South Beach Rd\_005

12. AAP registered the Works with the Register of Copyrights on March 29, 2022, and was assigned registration number VA 2-297-479. The Certificate of Registration is attached hereto as **Exhibit 2**.

13. At all relevant times AAP was the owner of the copyrighted Works at issue in this case.

#### **INFRINGEMENT BY FOS**

14. FOS has never been licensed to use the Works at issue in this action for any purpose.

15. FOS did not receive permission from any authorized third parties to use the Works at issue in this action for any purpose.

16. On a date after the Works at issue in this action were created, but prior to the filing of this action, FOS copied the Works and displayed them on the Website and the FOS Social Media Pages.

17. On or about August 10, 2023, AAP discovered the unauthorized use of its Works on the Website and the FOS Social Media Pages.

18. FOS copied AAP's copyrighted Works without AAP's permission.

19. After FOS copied the Works, it made further copies and distributed the Works on the internet to promote the sale of goods and services as part of its multi-platform sports, media, and news business.

20. FOS copied and distributed AAP's copyrighted Works in connection with Defendant's business for purposes of advertising and promoting Defendant's business, and in the course and scope of advertising and selling products and services.

21. FOS committed copyright infringement of the Works as evidenced by the documents attached hereto as **Exhibit 3**.

22. AAP never gave Defendant permission or authority to copy, distribute or display the Works at issue in this case.

23. AAP notified FOS of the allegations set forth herein on August 10, 2023 and has been in communication with FOS's legal representatives. To date, the parties have failed to resolve this matter.

**COUNT I**  
**COPYRIGHT INFRINGEMENT**

24. AAP incorporates the allegations of paragraphs 1 through 23 of this Complaint as if fully set forth herein.

25. AAP owns valid copyrights in the Works at issue in this case.

26. AAP registered the Works at issue in this case with the Register of Copyrights pursuant to 17 U.S.C. § 411(a).

27. FOS copied, displayed, and distributed the Works at issue in this case and made derivatives of the Works without AAP's authorization in violation of 17 U.S.C. § 501.

28. FOS performed the acts alleged in the course and scope of its business activities.

29. Defendant's acts were willful.

30. AAP has been damaged.

31. The harm caused to AAP has been irreparable.

**COUNT II**  
**CMI REMOVAL AND FALSE CMI ADDED**

32. AAP incorporates the allegations of paragraphs 1 through 23 of this Complaint as if fully set forth herein.

33. The Works at issue in this case contain copyright management information (“CMI”).

34. FOS knowingly and with the intent to enable or facilitate copyright infringement, removed CMI from the Works at issue in this action in violation of 17 U.S.C. § 1202(b).

35. FOS added their own CMI labeled “FOS” on the FOS Instagram Page as illustrated in **Exhibit 3**.

36. FOS added false credit on the FOS Instagram Page with the incorrect CMI “@palmbeachboard” as illustrated in **Exhibit 3**.

37. FOS added false credit on the Website with the incorrect attribution “Courtesy: Corcoran Reality” as illustrated in **Exhibit 3**.

38. FOS committed these acts knowing or having reasonable grounds to know that it will induce, enable, facilitate, or conceal infringement of AAP's rights in the Works at issue in this action protected under the Copyright Act.

39. FOS caused, directed, and authorized others commit these acts knowing or having reasonable grounds to know that it will induce, enable, facilitate, or conceal infringement of AAP's rights in the Works at issue in this action protected under the Copyright Act.

40. AAP has been damaged.

41. The harm caused to AAP has been irreparable.

WHEREFORE, the Plaintiff AFFORDABLE AERIAL PHOTOGRAPHY, INC. prays for judgment against the Defendant FRONT OFFICE SPORTS, LLC that:

a. FOS and its officers, agents, servants, employees, affiliated entities, and all of those in active concert with them, be preliminarily and permanently enjoined from committing the acts alleged herein in violation of 17 U.S.C. § 501;

b. FOS be required to pay AAP its actual damages and Defendant's profits attributable to the infringement, or, at AAP's election, statutory damages, as provided in 17 U.S.C. § 504;

c. AAP be awarded its attorneys' fees and costs of suit under the applicable statutes sued upon;

d. AAP be awarded pre- and post-judgment interest; and

e. AAP be awarded such other and further relief as the Court deems just and proper.

**JURY DEMAND**

AAP hereby demands a trial by jury of all issues so triable.

Dated: October 25, 2024

Respectfully submitted,

/s/ Jordan I. Abisoror

JORDAN I. ABISOROR

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